

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Bankr. No. 15-24752 CMB
JEWEL J. OUTLAW,)
Debtor.) Chapter 13
CITIZEN'S BANK,) Docket No. 77
Movant,) Related to Docket No.
vs.)
JEWL J. OUTLAW AND) Hearing Date & Time:
RONDA J. WINNECOUR,)
CHAPTER 13 TRUSTEE,)
Respondents.) Claim No. 16

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Jewel J. Outlaw , by and through her attorney, who respectfully represents the following:

1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Citizen's Bank filed various Notices of Mortgage Payment Change. The monthly mortgage payment of **\$247.37** was **increased** to **\$273.88** effective **4/28/2019**, then the monthly mortgage payment of **\$273.88** was **decreased** to **\$265.04** effective **5/28/2019**, then the monthly mortgage payment of **\$265.04** was **increased** to **\$273.87** effective **6/28/2019**, then the monthly mortgage payment of **\$273.87** was **decreased** to **\$265.05** effective **7/28/2019**, then the monthly mortgage payment of **\$265.05** was **increased** to **\$273.07** effective **8/28/2019**, then the monthly mortgage payment of **\$273.07** was **increased** to **\$273.88** effective **9/28/2019**, then the monthly mortgage payment of **\$273.88** was **decreased** to **\$254.83** effective **10/28/2019**, then the monthly mortgage payment of **\$254.83** was **decreased** to **\$252.77** effective **11/28/2019**, then the monthly mortgage payment of **\$252.77** was **decreased** to **\$234.41** effective **12/28/2019**.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Respectfully submitted.

Date: 12/23/2019 /s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire
Attorney for the Debtor
PA I.D. No. 56914
2403 Sidney Street
Suite 208
Pittsburgh, PA 15203
(412) 471-9670
rodsheph@cs.com

CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 9th day of May, 2019, by Electronic Filing and U.S. Mail, first class, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmevf@chapter13trusteewdpa.com

Citizens Bank
Attn: Jennifer L. Dellatore
Bankruptcy Department
One Citizens Bank Way
Mail Stop JCA115
Johnston, RI 02919

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd
Attorney for the Debtor
PA I.D. No. 56914
rodsheph@cs.com
2403 Sidney Street
Suite 208
Pittsburgh, PA 15203
412 471-9670